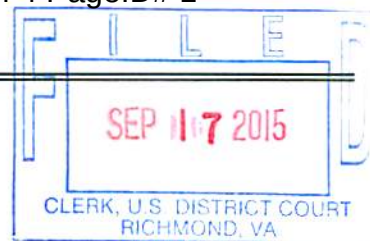


UNITED STATES DISTRICT COURT
for the
Eastern District of Virginia



United States of America
v.
ROBERT JUNIOR EPPS

Case No.

3:15MJ229

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 15, 2015 in the county of Henrico in the
Eastern District of Virginia, the defendant(s) violated:

*Code Section**Offense Description*

Title 18, United States Code,
Section 2113 (a)

to wit, by force, violence and intimidation, did knowingly and unlawfully take from the person and presence of another money belonging to and in the care, custody, control, management, and possession of the Union First Market Bank located at 4390 South Laburnum Avenue, Henrico, Virginia, a bank insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based on these facts:

See attached affidavit, incorporated by reference herein.

☒ Continued on the attached sheet.

Complainant's signature

Michael Mack, Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/15/2015

/s/ RY
Roderick C. Young
United States Magistrate Judge

Judge's signature

City and state: Richmond, VA

Roderick C. Young, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your affiant, Michael Mack, being duly sworn, hereby states:

I. Affiants Background and Experience

1. Your affiant is a law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), that is an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I am a Detective employed with the Henrico County Division of Police - Robbery Unit and am assigned as a Task Force Officer with the Federal Bureau of Investigation (FBI) - Central Virginia Violent Crimes Task Force. I have been so employed by the Henrico County Division of Police since May 2005, and am assigned to the Richmond, Virginia, Field Office. As part of my duties as a Detective and FBI Task Force Officer I have been involved in numerous investigations involving bank robberies, commercial robberies, narcotics, homicide, extortion, and other violent crimes. I have personally participated in the investigation set forth below.

2. I am familiar with the facts and circumstances of this investigation through: my personal participation; discussions with other agents of the FBI and other law enforcement agencies; my discussions with witnesses involved in the investigation; and my review of records and reports relating to this investigation. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another FBI agent, law enforcement officer or witness who may have had either direct or hearsay knowledge of that statement and to whom I or others have spoken or whose reports I have read and reviewed. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers, and witnesses.

3. I am aware that Title 18 of the United States Code, Section 2113(a), makes it a crime for anyone to use force and violence, or intimidation, to take any property, money or other thing of value belonging to, or in the care, custody, control, management, or possession of any bank, credit union or any savings and loan association. I also know that as used in that section, the term "bank" means any member bank of the Federal Reserve System, and any bank, banking association, trust company, saving bank, or other banking institution organized or operated under the laws of the United States, including a branch or agency of a foreign bank and any institution the depositions of which are insured by the Federal Deposit Insurance Corporation.

4. I make this affidavit in support of a criminal complaint charging Robert Junior Epps (EPPS), date of birth: XX/XX/1950, Social Security Number (SSN) XXX-XX-0733, with one count of Bank Robbery in violation of 18 USC 2113(a). Because this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant for this single charge, I have not

included each and every fact known to me or other law enforcement officers concerning this investigation. I have set forth only the facts necessary to support the charge in the Criminal Complaint.

II. FACTS

5. On Tuesday, September 15, 2015 at approximately 09:57 a.m., a man entered the Union First Market Bank located at 4390 South Laburnum Avenue Henrico County, Virginia, armed with a revolver. The man pointed the revolver at the bank employees. The man approached the counter and told the branch manager to let him in the back to the teller line. The branch manager complied. When the man got behind the counter, the man demanded United States Currency from the bank employees. The bank employees complied with the man's demands and gave the man bundles of United States currency which belonged to the bank. One of the bundles given to the man contained a tracking device. The man was holding an orange Nike bag and he and one of the tellers put the bank's United States currency into the bag and the man fled the bank.

6. Henrico Police Officers responded to the holdup alarm at the bank and were informed that the man had received a tracking device in one of the bundles of money. Henrico Police communications advised the responding officers the tracking device was on Interstate 295 and was heading south. The responding Henrico officers were given a description of the man and observed a person matching the description operating a white Saturn, bearing Virginia license plate VGU-2493. Henrico Officers activated their emergency lights and sirens in an attempt to stop the white Saturn, but the driver did not stop. Henrico Sergeant K.L. Motley successfully utilized a pursuit intervention technique which caused the vehicle to leave the roadway and come to rest on the shoulder of Interstate 295. The driver and sole occupant of the white Saturn was Robert Junior EPPS. Due to the vehicle crash and injuries to EPPS, Henrico Fire and EMS responded. As EPPS was removed from the vehicle, Henrico County Police Officer K. Lanham recovered a revolver from EPPS's pants pocket. United States currency was strewn about EPPS's vehicle and the orange Nike bag, which contained United States currency, also was in EPPS's vehicle. Officers confirmed that the tracking device was no longer in motion and recovered the tracking device from a bundle of currency still in the orange Nike bag.

7. The Union First Market Bank located at 4390 South Laburnum Avenue Henrico County, Virginia, is insured by the Federal Deposit Insurance Corporation and has a certificate so stating at the Bank.

III. CONCLUSION

8. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe that Robert Junior EPPS, did, by force, violence and intimidation, knowingly and unlawfully take from the person and presence of another money belonging to and in the care, custody, control, management, and possession of the Union First Market Bank located

at 4390 South Laburnum Avenue, Henrico, Virginia, a bank insured by the Federal Deposit Insurance Corporation, in violation of 18 U.S.C. § 2113(a).

Respectfully Submitted,



Michael Mack
Task Force Officer
Federal Bureau of Investigation

SWORN and SUBSCRIBED to before me this ^{17th Reg MM} 16th day of September 2015, in Richmond, Virginia

/s/ Rdy
Roderick C. Young
United States Magistrate Judge
Roderick C. Young
United States Magistrate Judge

Reviewed by Olivia L. Norman, AUSA